

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONALD TURNBULL,

Plaintiff,

-against-

JPMORGAN CHASE & CO.,

Defendant.

Civil Action No. 21-cv-03217-JGK

DEFENDANT’S NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that upon the accompanying Declaration of Sarah E. Bouchard, executed July 16, 2021, the exhibits annexed thereto, and the Memorandum of Law in Support of JPMorgan Chase & Co.’s Motion to Dismiss the Amended Complaint, dated July 16, 2021, and upon all the papers and proceedings previously had herein, Defendant JPMorgan Chase & Co., by and through its attorneys, Morgan, Lewis & Bockius LLP, will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, before the Honorable John G. Koeltl, United States District Judge, at a time and date to be designated by the Court, for a judgment, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing with prejudice the Amended Complaint on the grounds that the Complaint fails to state a claim upon which relief can be granted.

Dated: July 16, 2021

Respectfully submitted,
MORGAN, LEWIS & BOCKIUS LLP

/s/ Sarah E. Bouchard

Sarah E. Bouchard (*pro hac vice*)
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, Pennsylvania 19103
Tel: (215) 963-5000
Fax: (215) 963-5001

Gina F. McGuire
101 Park Avenue
New York, New York 10178
Tel: (212) 309-6000
Fax: (212) 309-6001

*Attorneys for Defendant
JPMorgan Chase & Co.*

CERTIFICATE OF SERVICE

I hereby certify that, on this 16th day of July, 2021, true and correct copies of the foregoing Notice of Motion, accompanying Memorandum of Law in Support of JPMorgan's Motion, and accompanying Declaration of Sarah E. Bouchard, executed July 16, 2021, and the exhibit(s) annexed thereto, were served on counsel for the Plaintiff via the Court's ECF system.

/s/ Sarah E. Bouchard

Sarah E. Bouchard